

SHIRLI F. WEISS (Bar No. 079225)
CHRISTOPHER M. YOUNG (Bar No. 163319)
NOAH A. KATSELL (Bar No. 217090)
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Tel: 619.699.2700
Fax: 619.699.2701
shirli.weiss@dlapiper.com
christopher.young@dlapiper.com
noah.katsell@dlapiper.com

PAUL J. HALL (Bar No. 66084)
DLA PIPER LLP (US)
555 Mission Street Suite 2400
San Francisco, CA 94105
Tel: 415.836.2500
Fax: 619.699.2701
paul.hall@dlapiper.com

Attorneys for Defendant
GROUPON, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SARAH GOSLING, on Behalf of Herself
and All Other Similarly Situated and the
General Public,

Plaintiff,

v.

GROUPON, INC., and DOES 1 through
100, inclusive,

Defendants.

CASE NO. 3:11-cv-01038 (CRB)

**STIPULATION AND ~~PROPOSED~~
ORDER FOR CONTINUANCE OF CASE
MANAGEMENT CONFERENCE AND
RELATED DATES**

Case Management Conference:

Date: June 17, 2011
Time: 8:30 a.m.
Courtroom: 8
Judge: Hon. Charles R. Breyer

1 Plaintiff Sarah Gosling ("Plaintiff") and Defendant Groupon, Inc. ("Groupon") by and
2 through their respective attorneys of record, stipulate as follows:

3 1. The initial Case Management Conference in this action is set for June 17, 2011 at
4 8:30 a.m.

5 2. Pursuant to the Order Setting Initial Case Management Conference and the Clerk's
6 Notice dated March 14, 2011, the deadline to file the Rule 26(f) Report, complete initial
7 disclosures or state objections to initial disclosures in the Rule 26(f) Report, and file the Case
8 Management Conference Statement is June 10, 2011, and the deadline for the parties to meet and
9 confer pursuant to Rule 26(f), file the ADR Certification, and file either a stipulation to ADR
10 Process or Notice of Need for ADR Phone Conference is May 24, 2011.

11 3. On May 16, 2011, the Judicial Panel on Multidistrict Litigation ("JPML") will
12 hear a motion to consolidate this case, along with other cases pending against Groupon
13 and certain "retailer" defendants in various district courts and involving similar allegations
14 ("MDL Motion").

15 4. The parties have previously stipulated and agreed to extend Groupon's time to
16 respond to the complaint until (i) 45 days after the filing of a Consolidated Amended Complaint
17 or whatever other deadline is set by the transferee court, in the event the JPML grants the MDL
18 Motion, or (ii) 45 days after service of the JPML's decision on the MDL Motion to consolidate or
19 whatever deadline is set by this Court, in the event the JPML denies the MDL Motion to
20 consolidate.

21 5. In light of the above, the parties hereby stipulate and request that the Court stay all
22 currently pending dates and deadlines in this matter, including the Case Management Conference
23 currently scheduled for June 17, 2011 at 8:30 a.m., pending the JPML's decision on the MDL
24 Motion. The parties further request that in the event the JPML denies the MDL Motion, the

25 /////

26 /////

27 /////

28 /////

1 Court reset the Case Management Conference for a date no sooner than 45 days after service of
2 the JPML's decision on the MDL Motion.

3 **IT IS SO STIPULATED.**

4
5 Dated: April 28, 2011

DLA PIPER LLP (US)

7 By s/ Christopher M. Young
8 SHIRLI F. WEISS
9 PAUL J. HALL
10 CHRISTOPHER M. YOUNG
11 NOAH A. KATSELL
12 Attorneys for Defendant
13 GROUPON, INC.

14
15 Dated: April 28, 2011

ROBBINS GELLER RUDMAN & DOWD LLP

17 By s/ John J. Stoia, Jr.
18 JOHN J. STOIA, JR.
19 RACHEL L. JENSEN
20 PHONG L. TRAN
21 Attorneys for Plaintiff
22 SARAH GOSLING

23
24 I, Christopher M. Young, attest that concurrence in the filing of this document has been
25 obtained from each of the signatories. I declare under penalty of perjury under the laws of the
26 United States of America that the foregoing is true and correct. Executed on this 28th day of
27 April, 2011 at San Diego, California.

28 By: s/ Christopher M. Young
CHRISTOPHER M. YOUNG
Attorney for Defendant Groupon, Inc.

ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that all dates and deadlines in this matter are stayed pending the decision of the Judicial Panel on Multidistrict Litigation ("JPML") on the MDL Motion to consolidate. The Case Management Conference currently scheduled for June 17, 2011 at 8:30 a.m. is taken off calendar, and shall be rescheduled for a date no sooner than 45 days after service of the JPML's decision on the MDL Motion, in the event the JPML denies the MDL Motion.

IT IS SO ORDERED.

May 05
Dated: April 28, 2011

